

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

KELLY LIBBY & HOOPES, P.C.,
and
GREENBERG TRAURIG LLP,

Plaintiffs,

vs.

ULICO CASUALTY COMPANY,

Defendant.

Civil Action No. 05-11859 (RCL)

DEFENDANT'S MEMORANDUM OF LAW IN SUPPORT OF MOTION FOR A TWO-WEEK EXTENSION TO FILE ITS ANSWER AND TO IMPEAD ANY THIRD PARTIES

Defendant Ulico Casualty Company ("Ulico") respectfully submits this memorandum of law in support of its motion for a two-week extension to file its answer and to implead any third parties.

On March 6, 2006, the Court ordered Ulico to file its answer and implead any third parties under Federal Rule of Civil Procedure 14 on or before March 27, 2006. The plaintiffs and Ulico are currently engaged in discussions that might eliminate any need for Ulico to file an answer or to implead any third parties. Ulico respectfully requests, therefore, that the Court afford the parties an additional two weeks, through April 10, 2006, to pursue these discussions before requiring Ulico to file its answer and implead any third parties. Alex D. Hardiman of Anderson Kill & Olick, P.C., counsel for plaintiffs, consents to the two-week extension sought through this motion.

Dated: March 24, 2006

ULICO CASUALTY COMPANY,

By its attorneys,

/s/ Lon A. Berk

Lon A. Berk (BBO# 546835)
Michael S. Levine (*admitted pro hac vice*)
Syed S. Ahmad (*admitted pro hac vice*)
HUNTON & WILLIAMS, LLP
1751 Pinnacle Drive, Suite 1700
McLean, Virginia 22102
(703) 714-7400 (Telephone)
(703) 918-4050 (Facsimile)
E-Mail: lberk@hunton.com

CERTIFICATE OF SERVICE

I, Lon A. Berk, hereby certify that Defendant's Memorandum of Law in Support of Motion for a Two-Week Extension to File Its Answer and to Implead any Third Parties was filed through the ECF system and will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).

/s/ Lon A. Berk

Lon A. Berk (BBO# 546835)

DEFENDANT'S MEMORANDUM OF LAW IN SUPPORT OF MOTION FOR A TWO-WEEK
EXTENSION TO FILE ITS ANSWER AND TO IMPLEAD ANY THIRD PARTIES